

PUBLIC SUBMISSION

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Docket: EPA-HQ-OPP-2013-0226

Petition to Establish Tolerances for Chemical Flupyradifurone - First Food Use

Comment On: EPA-HQ-OPP-2013-0226-0007

Public Participation Memorandum for New Active Ingredient Flupyradifurone

Document: EPA-HQ-OPP-2013-0226-0027

Comment submitted by Michael Bledsoe, Senior Vice President, Food Safety and Regulatory Affairs, Village Farms International

Submitter Information

General Comment

Subject: US Greenhouse Hydroponic Tomato and Cucumber Industry support for Silvanto , Flupyradifurone (BYI02960).

The US large scale (greater than 10 acres) Greenhouse Hydroponic Vegetable industry began 25 years ago. At that time Greenhouse tomatoes represented approximately 0.5% of the US Fresh Market tomato sales dollars. Today Greenhouse Hydroponic Tomatoes represent greater than 50% of sales dollars in the US grocery stores and greater than 70% in the big box stores.

The IR-4 Project has been critical to our industries growth. Due to their support and the support from Bayer, flupyradifurone will be submitted for registration in 2015 by Bayer and IR-4 for Greenhouse tomato and cucumbers. This material is very important to the future of our industry. It has demonstrated efficacy both foliar and drench for aphids, leafhoppers, Whiteflies, Scales, Psyllids, and Scirtothrips.

Flupyradifurone on Greenhouse insects was chosen as an IR-4 A priority for registration, because it manages several critical pests such as aphids, leafhoppers, psyllids, whiteflies, scales, and thrips with limited risk/damage to bumble bees. Our industry grows and harvests year round, and is in constant bloom. Because of the short REI and PHI for Greenhouse uses, and a strong feeding cessation it can become the product of choice when battling arboviruses from whiteflies, thrips and liberibacter carried by psyllids.

Flupyradifurone also demonstrates Xylem systemic root uptake. This is critical to our industry. A foliar application to a 40 acre greenhouse (standard large scale footprint) requires the vertical spray boom to travel slightly more than 121 miles, and requires several nights to apply. While we will use and want the foliar application, drench application can be administered in 20 minutes throughout the drip system, and may be the difference in success or failure in stemming an infestation.

Our industry strongly supports and needs this registration. Please let me know if you need additional information or if I can answer any additional questions.

Regards,

Michael Bledsoe, Ph.D.
Senior Vice President, Food Safety and Regulatory Affairs
Village Farms International, and representative for the Certified Greenhouse Farmers Association.
See attached file(s)

Attachments

Comment